



3. The controlled substance involved in the offense was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b) (1) (A).

(Title 21, United States Code, Section 846.)

Forfeiture Allegation

4. As a result of committing the controlled substance offense charged in Count One of this Indictment, THOMAS SCOTT, a/k/a "Tommy Guns," and KENYATTA MANZINI CKYYOU, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of said offenses and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense charged in Count One of the Indictment.

Substitute Asset Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of THOMAS SCOTT, a/k/a "Tommy Guns," and KENYATTA MANZINI CKYYOU, the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited

with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of SCOTT and CKYYOU up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

  
FOREPERSON

  
PREET BHARARA   
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

v.

THOMAS SCOTT,  
a/k/a "Tommy Guns," and  
KENYATTA MANZINI CKYYOU,

Defendant.

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INDICTMENT

12 Cr.

(21 U.S.C. § 846.)

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.

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Nov 20, 2012

Filed Indictment. Case assigned to Judge McMahon.

U.S.M.J. Debra Freeman.